

THE URBAN LAW FIRM

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Counsel for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TRUSTEES OF THE BRICKLAYERS &
ALLIED CRAFTWORKERS LOCAL 13
DEFINED CONTRIBUTION PENSION
TRUST FOR SOUTHERN NEVADA;
TRUSTEES OF THE BRICKLAYERS &
ALLIED CRAFTWORKERS LOCAL 13
HEALTH BENEFITS FUND; TRUSTEES OF
THE BRICKLAYERS & ALLIED
CRAFTWORKERS LOCAL 13 VACATION
FUND; BRICKLAYERS & ALLIED
CRAFTWORKERS LOCAL 13 NEVADA;
TRUSTEES OF THE BRICKLAYERS &
TROWEL TRADES INTERNATIONAL
PENSION FUND; TRUSTEES OF THE
BRICKLAYERS & TROWEL TRADES
INTERNATIONAL HEALTH FUND; and
TRUSTEES OF THE INTERNATIONAL
MASONRY INSTITUTE,

Plaintiffs,

vs.

PEGASUS MARBLE, INC., a Nevada
corporation; and GAGIK ZARGARYAN, an
individual,

Defendants.

CASE NO: 2:19-cv-00362-GMN-CWH

**STIPULATION FOR DISMISSAL
WITHOUT PREJUDICE**

1 Plaintiffs, TRUSTEES OF THE BRICKLAYERS & ALLIED CRAFTWORKERS LOCAL 13
2 DEFINED CONTRIBUTION PENSION TRUST FOR SOUTHERN NEVADA, TRUSTEES OF THE
3 BRICKLAYERS & ALLIED CRAFTWORKERS LOCAL 13 HEALTH BENEFITS FUND,
4 TRUSTEES OF THE BRICKLAYERS & ALLIED CRAFTWORKERS LOCAL 13 VACATION
5 FUND (hereinafter “BAC Trusts”); BRICKLAYERS & ALLIED CRAFTWORKERS LOCAL 13
6 NEVADA (hereinafter “Local 13”); TRUSTEES OF THE BRICKLAYERS & TROWEL TRADES
7 INTERNATIONAL PENSION FUND; TRUSTEES OF THE BRICKLAYERS & TROWEL TRADES
8 INTERNATIONAL HEALTH FUND; and TRUSTEES OF THE INTERNATIONAL MASONRY
9 INSTITUTE (hereinafter “International Trusts”) (hereinafter collectively as “Plaintiffs” or “Trust
10 Funds”), by and through their counsel of record, The Urban Law Firm and Defendants, PEGASUS
11 MARBLE, INC. and GAGIK ZARGARYAN (hereinafter collectively as “Defendants”), by and through
12 their counsel of record, Law Office of Daniel Marks, hereby agree and stipulate subject to the approval
13 and Order of the Court, as follows:

14 1. A full and final settlement of the above-entitled action has been entered into and
15 agreed to by the parties. Therefore, the parties request this action be dismissed without prejudice.

16 2. The parties have executed a Settlement Agreement and Mutual Release setting
17 forth the terms of their agreement. The terms and conditions of the Settlement Agreement and Mutual
18 Release, and all documents referred to or attached thereto, are incorporated herein by this reference.

19 3. Each party to bear its own fees and costs.
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2 DATED: August 7, 2019

THE URBAN LAW FIRM

3 /s/ Nathan R. Ring

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Counsel for Plaintiffs

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15 DATED: August 7, 2019

LAW OFFICE OF DANIEL MARKS

16 By: /s/ Daniel Marks

17 Daniel Marks, Nevada State Bar No. 002003
18 Adam Levine, Nevada State Bar No. 004673
19 ***Counsel for Defendants***

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IT IS SO ORDERED.

DATED this 20 day of August, 2019.

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